

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

RUSSELL F. SHEEHAN, as he is ADMINISTRATOR,
ELECTRICAL WORKERS' HEALTH AND
WELFARE FUND, LOCAL 103, I.B.E.W.;
ELECTRICAL WORKERS' PENSION FUND,
LOCAL 103, I.B.E.W.; ELECTRICAL WORKERS'
SUPPLEMENTARY HEALTH AND WELFARE
FUND, LOCAL 103, I.B.E.W.; ELECTRICAL
WORKERS' DEFERRED INCOME FUND,
LOCAL 103, I.B.E.W.; ELECTRICAL WORKERS'
JOINT APPRENTICESHIP AND TRAINING
FUND, LOCAL 103, I.B.E.W.; ELECTRICAL
WORKERS' EDUCATIONAL AND CULTURAL
FUND; ANTHONY J. SALAMONE, as he is
ADMINISTRATOR, NATIONAL ELECTRICAL
BENEFIT FUND; and LOCAL 103, INTERNATIONAL
BROTHERHOOD OF ELECTRICAL WORKERS,
Plaintiffs

vs.

CHRIS MEALEY ELECTRICAL, INC.,
Defendant

and

FIRST TRADE UNION BANK and FLEET BANK,
Trustees

C.A. No. 04-12209 EFH

**AFFIDAVIT OF GREGORY A. GEIMAN IN SUPPORT OF MOTION
FOR THE ISSUANCE OF A CAPIAS**

1. My name is Gregory A. Geiman. I am an attorney with the law firm of Segal, Roitman & Coleman and I represent the Plaintiffs in their above-referenced suit against Chris Mealey Electrical, Inc.

2. To date, despite unsuccessful attempts at telephone communication, including the leaving of voicemails on Mr. Mealey's cellular telephone in December, 2006, Mr. Mealey has failed to provide me with either the 2005 tax return for Chris Mealey Electrical, Inc. or a letter or other appropriate documentation from his accountant confirming that the corporation did not conduct any business in 2005. I advised Mr. Mealey via voicemail on his cellular telephone of the Court's scheduling of a Status Conference in this matter, and the importance of his providing the necessary records to me before the date of the Status Conference. Mr. Mealey did return one of my calls on November 30, 2006 and left a voicemail stating that he would seek to produce the necessary records. However, said records were not received by the date of the Status Conference and Mr. Mealey has failed to return my voicemails left after November 30, 2006.

3. Further, Mr. Mealey has to date failed to pay the \$6,836.55 fine that was levied by this Court in its February 15, 2006 Order against Mr. Mealey personally, which is to be remitted to the Plaintiffs.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 22nd DAY OF DECEMBER, 2006.

/s/ Gregory A. Geiman
Gregory A. Geiman, Esquire

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Affidavit of Gregory A. Geiman in Support of Motion for the Issuance of a Capias has been served by certified and first class mail upon defendant Chris Mealey Electrical, Inc. at 90 Wilkins Road, Braintree, MA 02184 this 22nd day of December, 2006.

/s/ Gregory A. Geiman
Gregory A. Geiman, Esquire